Appendix A: Summary of Recommendations Table

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
Improving Integration and Communication Recommendations								
1. The Deputy Administrator should create a Superfund Board of Directors to improve program coordination, integration and accountability.	X	X	X	X	X	X	X	X
2. Senior program managers should evaluate the program's current goals and objectives and clearly communicate the hierarchy among these goals to ensure that Superfund resources are properly directed to achieve the Agency's most important goals	X							X
3. OSWER and the lead Region should spearhead an effort to develop performance measures that are consistent with the newly articulated hierarchy of goals.	X	X	X	X	X	X	X	X
4. OSWER and the Regions should work together to maintain a sufficient rate of listing on the NPL to provide a clear incentive for potentially responsible parties (PRPs) to perform work under the Superfund program as well as other programs or authorities.	X							X
5. OSWER should allocate resources to start Fund-lead actions at every step in the Superfund pipeline, thereby motivating PRPs to commit to taking on work and freeing up appropriated dollars over the longer term.	X							
6. OSWER should promote the One Cleanup Program more aggressively and set more ambitious targets for policy and guidance development in order to continue to improve the coordination, speed, and effectiveness of cleanups.	X	X						X

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
7. OSWER and OECA should build upon their work to improve and strengthen performance measurement by establishing measures that encourage the various cleanup approaches to complement each other.	X	X						X
8. All national program managers (NPMs) with Superfund resources should adopt and track a manageable number of meaningful performance measures and ensure data systems are in place to facilitate timely and accurate reporting.	X	X	X	X	X	X	X	X
9. OSWER and OECA should consider adopting goals that cut across different program activities (e.g., cleanup completions through use of any tool or combination of tools) to improve teamwork and gain full recognition for all work that produces similar outcomes.	X	X						X
10. OSWER should evaluate the history of NPL listings and removal actions to determine what percent were RCRA treatment, storage, and disposal facilities or hazardous waste generators and to what extent these facilities present a continuing burden to the Superfund program.	X							
11. If the evaluation confirms a high correlation with RCRA-regulated facilities, OSWER and OECA should examine different approaches to financial assurance under the RCRA program to reduce the likelihood of RCRA-regulated facilities becoming part of the future Superfund universe.	X							
12. For facilities not covered under RCRA, OSWER should study whether promulgating new regulations under CERCLA's broad financial assurance authorities could reduce the future needs of the Superfund program.	X							
13. The Agency should collect data at the end of the budget year on the amount of funds spent on direct cleanup or on those activities that are necessary to get to the cleanup phase and communicate the cost of cleanups more effectively.	X	X			X			X

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
14. OSWER and the Regions, in coordination with OCFO, should work together to identify ways to simplify the internal budget structure.	X				X			X
15. OSWER and OECA should include special account and state cost share as they allocate funds internally and communicate funding availability.	X	X						X
16. All national program managers with Superfund resources should evaluate and pursue opportunities for greater resource or work sharing among Regions, especially in support functional areas.	X	X	X	X	X	X	X	X
17. The lead Region should facilitate a process that takes advantage of capabilities already developed and demonstrated in areas of programmatic specialization by encouraging Regions with needs in these areas to obtain support from the Regions with the capability and capacity to take on more work.	X	X		X	X	X		X
18. The Agency should conduct benchmarking studies of regional performance in both management and programmatic areas to ensure that all aspects of the program are focusing on improving performance.	X	X	X	X	X	X	X	X
19. The Agency should execute other smaller-scale adjustments as appropriate, and begin setting the stage now for redistributing staff positions for FY 2007, after the consolidations, specializations, and benchmarking have been reviewed and incorporated.	X	X	X	X	X	X	X	X
20. The Agency should evaluate headquarters Superfund FTEs and make every effort to redirect resources to activities that more directly contribute to site cleanups.	X	X	X	X	X	X	X	
21. EPA Regions and headquarters should establish a schedule for FY 2004 deobligations and initiate actions immediately so the funds will be available during this fiscal year.	. X	X	X	X	X	X	X	X

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
22. OSWER and OECA should review guidance and policies to ensure that they are addressing current and future needs and follow up with the Regions on using the guidance and policies.	X	X						X
Capitalizing on Lessons Learned for Cleanup Actions Recommendations								
23. OSWER should maintain a sufficient rate of listing on the NPL to function as an incentive for PRPs to perform work under the Superfund program as well as other programs or authorities.	X							
24. While continuing to stress early PRP search activity and maximizing PRP involvement, OSWER should continue to target funds to begin RI/FS work where PRP recalcitrance is evident.	X							X
25. OSWER should revise the Superfund Alternative Site policy to ensure that criteria for being a Superfund Alternative Site are uniform and that the Regions provide the PRPs and other interested parties with transparent site assessment and pre-scoring information.	X							X
26. The Regions should establish and implement a process by which Superfund Alternative Sites are prioritized along with their NPL sites to ensure that response funds are being spent on the sites with the highest risk.								X
27. OSWER and the lead Region should work together to ensure all site cleanup work (including work completed under the Alternative Site program) is tracked and reported internally and externally to ensure accomplishments of the national program are appropriately communicated to the public and Congress.	X							X

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
28. OSWER should work with the Regions to establish a process for national review of the scope of potential mega sites at the time of listing in order to ensure that sites are properly characterized as early as possible so that out year funding can needs be more accurately forecast as part of the development of the President's budget.	X							X
29. OSWER should examine its site assessment criteria to ensure that the Regions are integrating the Brownfields site assessment objectives into the Superfund site assessment process in order to capitalize on potential programmatic efficiencies and resource savings.	X							X
30. The Regions should continue to make a standard practice of integrating site assessment work more fully with early-stage remedial work in order to expedite remedial activities and save resources.								X
31. OSWER should encourage more Regions to adopt the best practice (or "one list") approach to help ensure that the collective resources of EPA and the states are being utilized to achieve the greatest benefits.	X							X
32. Since some sites have high risks but do not require an extensive study, OSWER should clarify the process for obtaining an exemption to the current dollar limit for cleanups under removals or recirculate the current guidance.	X							
33. The Agency needs to find a permanent fix for the high-priority funding needed for the 50 homeland security FTE that the Regions were required to hire.	X				X			X
34. As part of the next budget process, the Agency should evaluate whether, above and beyond the initial FTE, the Agency needs more dollars and FTE to address preparation for nationally significant incidents.	X				X			

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
35. Building upon the development of the Regional Response Teams, OSWER and the Regions should support more cross training among OSCs, RPMs, and SAMs to support removal efforts while OSCs are addressing nationally significant incidents.	X							X
36. OSWER should conduct an evaluation of historical removal actions to determine whether patterns exist in certain industries (Standard Industrial Classification codes).	X							X
37. The work of the NRRB has resulted in reduced costs for selected remedies. OSWER should re-evaluate the criteria for identifying sites for scrutiny by the Board, with an eye toward expanding the number of sites undergoing review.	X							X
38. Since the recommendations of the NRRB are optional for the Regions to implement, the charter of the board regarding accountability for implementing its recommendations made to the Regions should be revisited in light of the maturation of the program and the board's changing role.	X							X
39. To ensure cost-efficient engineering of remedies, OSWER should require value engineering (review of design detail for cost efficiency) as a requirement for all remedies above a certain dollar level.	X							
40. OSWER should consider cost reviews of every site with a long tem response action (LTRA) to reduce remedy costs. Cost saving approaches should be shared across the regions.	X							X
41. OSWER should set up a review team of headquarters and regional staff to make sure that the selected remedies at sites incorporate new technology and the most cost-efficient cleanup approach based on experience since the remedies' selection.	X							X

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Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
42. OSWER and the Regions should identify a limited number of common site types and successful designs, and make them available to the Regions for remedies at similar sites.	X							X
43. Regional senior management should be involved in selecting the cleanup mechanism (e.g. other Federal Agency, Remedial Action Contractor (RAC), or state) to ensure that funds are being managed as effectively as possible.								X
44. Regional management should encourage RPMs to conduct appropriate on-site oversight during construction to monitor the activities performed by contractors, other federal or state agencies.								X
45. OSWER, OECA, and the Regions should re-examine existing policies relating to state lead clean up.	X	X						X
46. OSWER, OECA, and the Regions should re-examine existing state lead sites to determine if the remediation is being conducted in a timely and cost efficient manner.	X	X						X
47. The Regions should evaluate options for completing all work at each site, making the fullest appropriate use of in-house capabilities to maximize the use of contract dollars and resources.								X
48. OSWER should evaluate the need, the overall funding levels, and the priorities for state cleanup programs given the Section 308 program and the original goal of the Core program to build state capacity.	X							X
49. The Regions should fully and consistently implement the approach proposed by the Field and Analytics Services Teaming Advisory Committee (FASTAC) for cost effective analytic support for both the remedial and removal programs.								X

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
50. OSWER and the Regions need to have a national dialogue to pursue flexibility between resources allocated between CLP and ESAT contracts to encourage greater cost-effectiveness.	X							X
51. The Superfund Division Directors and the regional laboratories should forecast the long-term analytical needs for the program, and should investigate whether the Centers of Applied Science approach would be appropriate for the program.								X
Enhancing Enforcement Recommendations								
52. The Enforcement Program should return to a common-sense definition that includes oversight of PRP actions as an enforcement activity which will improve FTE utilization.		X						X
53. To continue to increase the percentage of PRP cleanups and take further pressure off appropriated funds, OECA should conduct responsible party search benchmarking to identify strong regional programs.		X						X
54. OECA and OSWER should work with the Lead Regions to develop goals similar to those in the remedial program for enforcement first in the removal program to increase the percentage of PRP-conducted removal actions.	X	X						X
55. OSWER should identify a management liaison who can work with OECA to facilitate and support enforcement first for the removal program.	X	X						X
56. OECA, in consultation with the Department of Justice (DOJ), should explore ways to access or gain greater expertise in the area of insurance-related cost recovery (i.e., insurance archaeology), and sponsor several pilot programs across the country to increase potential sources of funding for orphan sites.		X						

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
57. To improve individual regional performance, OECA and the lead Region should evaluate current enforcement measures and develop additional regional site-specific measures that provide a more accurate picture of the program's success and provide an incentive to improve performance.		X						X
58. OECA and the Regions should develop procedures that encourage continued collaboration with PRPs in site cleanups in order to decrease the need for EPA's expenditure of oversight resources.		X						X
59. Senior management within EPA and the DOJ should affirm their commitment to cost recovery.		X						
60. To improve the tracking and recovery of removal costs, Regions that have not invested in field administrative specialists should develop this expertise, or find other ways to accomplish the same goal.								X
61. OECA and the Regions should discuss the current special account guidance to determine if additional clarification is necessary to maximize the use of special account dollars.		X						X
62. Regions should track and periodically report to headquarters how much special account money they are using annually and how they are using it.		X						X
Examining the Role of Research and Technology Recommendations								
63. ORD, OSWER, and the Regions should work together to survey Superfund managers and RPMs by June 2005 to discover if the actions taken above have addressed the concerns of the Regions about having input into the Agency's research agenda and the value and utility of long-term research.	X		X					

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
64. The Assistant Administrators and/or Deputy Assistant Administrators for ORD and OSWER should meet with the Deputy Administrator no later than June 10, 2004, to discuss improvements both organizations intend to implement to improve the effectiveness of the Superfund research program.	X		X					
65. OSWER should examine the feasibility of using a more quantitative cost–benefit methodology for selecting technology innovation projects, since resources are so limited in order to further improve program effectiveness.	X							
Evaluating Superfund's share of Management and Support Recommendations								
66. OCFO should analyze the Superfund charging across the Agency to ensure the use of approved methodologies and get a better understanding of the variations.	X	X	X	X	X	X	X	X
Optimizing the Use of Superfund Dollars Recommendations								
67. OECA should set a site-specific charging goal (e.g., XX percent) tailored for each Region.		X						X
68. Key program offices (OECA, OSWER, and OCFO) should review the new payroll system to determine if there are opportunities to make site-specific charging easier and more user-friendly.	X	X			X			
69. The Regions should continue to build cost analysis expertise.	X							X
70. OSWER should review and potentially revise the Brownfields deobligation policy documents in light of statutory changes and the progress made in reviewing older grants.	X							

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
71. OSWER and the Regions should evaluate the unexpended dollars on older Brownfields grants to determine if those funds can be used for the original award purpose.	X							X
72. For programmatic contracts and IAGs, OSWER should immediately establish a pool of $5 million to cover indirect cost rate adjustments and late bills for Headquarters and Regional response contracts and additional bills for IAGs	X							X
73. OCFO and OARM should work together to develop standard operating procedures for resolving billing issues with other federal agencies.				X	X			
74. If it has not already done so, OSWER should circulate the Direct Cite payment process document to the Regions and ensure that staff members are properly educated on the process.	X							X
75. OARM and OCFO, in consultation with the Grants Management Council, should review the current IAG closeout policy to determine if any revisions to the guidance are needed.				X	X			
76. Common grant closeout issues should be discussed at the Grants Management Council, and the Agency should establish consistent approaches to these problems.				X				
77. Headquarters and the Regions should identify which other federal agencies they are having difficulty with managing and closing out IAGs.	X			X	X			X
78. For IAGs, grants, and contracts, OARM should establish appropriate closeout performance measures and send quarterly reports to Senior Resource Officials with outstanding closeouts, including the amount of outstanding dollars.				X				
79. OARM, OSWER, and the Regions should work together to encourage the use of alternative contract types.	X			X				X

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
80. OARM and regional contracting officers should offer regular training for contract personnel, RPMs, OSCs, and project officers in alternative contract mechanisms.				X				
81. OARM and the Assistant Regional Administrators should conduct an analysis to determine if cost efficiencies and programmatic benefits can be obtained by consolidating contract functions.				X				X
82. OSWER, with support from OARM, should provide increased contract management training.	X			X				X
83. OARM and OSWER should work closely with the Regions to monitor contracts to ensure that the Regions have not funded their contracts into the future to an extent where they cannot appropriately use the funds during the contract period.	X			X				X
84. In the near term, the OSWER Senior Resource Official should establish policies for the durations of grants and IAGs. For the long term, OARM should work with the Agency to establish Agency policies for the durations of all types of grants and IAGs.	X	X	X	X	X	X	X	X
85. OARM and the Regions should analyze the different types of grants to determine their current funding levels and draw-down histories and establish criteria that will be used to evaluate grants that need increased monitoring.				X				X
86. OARM should continue its commitment to create an improved overall training course for project officers and IAG specialists focusing solely on IAGs				X				
87. OARM should continue to build upon the improvements already undertaken to better monitor grants in the areas of billing, deliverables, and milestones, and should ensure that the proper monitoring tools are available to managers and staff.				X				

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
88. OARM should provide status updates to project officers and managers on the future deployment of the IAG module of IGMS.				X				
89. OSWER should evaluate and update, if necessary, national policy on state cost share, payment policy, and refund policy. If this guidance does not need to be updated, the 1990 guidance should be re-circulated.	X							
90. OSWER and OCFO, if needed, should work together to establish monthly reports that staff and managers can use to better track SSC collections, obligations, and expenditures.	X				X			
91. OSWER and the Regions should work together to establish performance measures for SSCs, which could address the timeliness of collecting funds and returning excess funds to states.	X							X
92. OSWER and OARM should analyze how much EPA is paying other federal agencies in indirect, PPMD, and other costs.	X			X				
93. EPA headquarters should negotiate a national overhead rate for all IAGs depending on the results of the (above) analysis	X			X				
94. The Regions should continue or should reestablish regular meetings between regional senior managers and their counterparts to discuss project milestones, deliverables status, and opportunities to minimize cost growth.								X
95. OCFO should develop fact sheets on setting up special accounts, utilizing special account dollars, and closing out the accounts.					X			
96. OECA and OCFO should design reports that clearly describe the use and status of special accounts, and should provide them to managers in the Regions and headquarters on a regular basis.		X			X			

Recommendation	OSWER	OECA	ORD	OARM	OCFO	OEI	OAR	Regions
97. OECA should identify the oldest special accounts and then meet with the Regions to discuss uses of those dollars and progress toward using them.		X						X
98. OARM and OCFO should work with Senior Resource Officials to communicate the development and deployment status of new Agency-wide systems (financial management, grants and IAG management).				X	X			
99. OSWER and the Regions should evaluate which systems and tools currently exist or are under construction and should circulate this information in order to avoid duplication of data systems and tools	X							X
Reviewing Existing Performance Measures Recommendations								
100. ORD should continue their internal review and revise, where appropriate, their Superfund performance measures to become more program results-oriented.			X					
101. OSWER and OECA (and possibly other offices as well) should initiate a benchmarking study associated with an important Superfund operation or function, such as RI/FSs or PRP searches in order to improve the Superfund program's efficiency, foster opportunities for innovation, and adopt best management practices.	X	X						X
102. EPA's management and support offices should meet with their Superfund response and enforcement clients to review current measures and possibly establish new performance measures specific to the Superfund program, such as on special accounts and cost recovery in order to increase the Superfund program's integration and efficiency.				X	X			X
TOTALS	68	34	13	29	24	11	10	70